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Subject Environmental Defense comments on Isophthalonitrile (CAS# 626-17-5)

(Submitted via Internet 2/3/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Chip.witcher@syngenta.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Isophthalonitrile (CAS# 626-17-5).**

Syngenta Crop Protection, Inc., in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing available data for isophthalonitrile.

Our review of the test plan indicates that it is rather cursory. While exposure information is not strictly required, this submission lacks even the basic information included in most other HPV Challenge submissions. Regarding the uses of this chemical it states only that isophthalonitrile "is used as an intermediate in the production of certain agricultural chemicals (e.g. fungicides)." The test plan provides no information as to whether isophthalonitrile is produced in a closed or open system, whether residues of it may remain in the finished product(s) or if this chemical is shipped from the point at which it is produced to the point(s) at which it is used. The test plan also makes no mention of possible occupational or environmental exposures that could result as a result of the production and/or use of isophthalonitrile and the products which it is used to synthesize. An indication of the approximate production volume would also have been useful to include.

Data cited in the test plan are drawn from the earlier submission to the International Uniform Chemical Information Database (IUCLID), which serves as the robust summaries for this submission. Even though these reports are unpublished, it would be more informative if the test plan is revised to cite the individual studies rather than referring only to the IUCLID document, so that the reader can more readily determine where and when they were generated. It should also be noted that neither the test plan nor the robust summaries provide one basic, required SIDS element, the structural formula of isophthalonitrile.

In its Summary, the test plan concludes that "no additional studies are currently needed to fulfill the SIDS data set." However, the test plan clearly states that data for two required SIDS elements under the heading Environmental Toxicity, toxicity to invertebrates and to aquatic plants, are not available. The absence of adequate studies for these two elements constitutes data gaps that require additional work.

Other data gaps are those addressing Environmental Fate. It is proposed that these data be generated by computer modeling. We do not consider this approach sufficient nor is the submission complete until measured data for those endpoints are provided.

Data addressing the SIDS elements for acute and repeated dose toxicity to mammals, while somewhat dated, are adequate. However, the proposal to use data gleaned from a study of reproductive toxicity to address the SIDS element for developmental toxicity, though permitted when a thorough study of reproductive toxicity is available, does not appear justified in the present case.

In summary, this is a marginal submission. In light of the failure of the test plan to propose to address the missing data for toxicity to invertebrates and to aquatic plants and to provide only modeled data for environmental fate endpoints, we consider this submission to be unacceptable.

Thank you for this opportunity to comment.

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